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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 TRUSTEES OF THE NEVADA RESORT
12 ASSOCIATION - INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
13 EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE
14 UNITED STATES AND CANADA,
LOCAL 720, PENSION TRUST;
15 TRUSTEES OF THE NEVADA RESORT
ASSOCIATION - INTERNATIONAL
16 ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
17 MACHINE OPERATORS OF THE
UNITED STATES AND CANADA,
18 LOCAL 720, WAGE DISABILITY
TRUST; AND TRUSTEES OF THE
19 NEVADA RESORT ASSOCIATION -
INTERNATIONAL ALLIANCE OF
20 THEATRICAL STAGE EMPLOYEES
AND MOVING PICTURE MACHINE
21 OPERATORS OF THE UNITED STATES
AND CANADA, LOCAL 720,
22 APPRENTICE AND JOURNEYMAN
TRAINING AND EDUCATION TRUST,

23 Plaintiffs,

24 vs.

25 HARRAH'S LAS VEGAS, LLC f/k/a
HARRAH'S LAS VEGAS, INC., d/b/a
26 HARRAH'S LAS VEGAS, a Nevada
limited-liability company,

27 Defendant.
28

Case No. 2:13-cv-00040-APG-PAL

Consolidated with:

Case No.: 2-13-cv-00042-APG-PAL
Case No.: 2-13-cv-00043-APG-PAL
Case No.: 2-13-cv-00046-APG-PAL
Case No.: 2-13-cv-00047-APG-PAL

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND STAY FOR TWO
WEEKS PENDING SETTLEMENT
NEGOTIATIONS**

FLAMINGO LAS VEGAS OPERATING
COMPANY, LLC f/k/a PARK PLACE
ENTERTAINMENT CORPORATION
d/b/a FLAMINGO HILTON – LAS
VEGAS, a Nevada limited-liability
company,

Defendant.

DESERT PALACE, INC. d/b/a CAESARS
PALACE, a Nevada corporation,

Defendant.

PARIS LAS VEGAS OPERATING
COMPANY, LLC f/k/a PARBALL
CORPORATION d/b/a PARIS, LLC, a
Nevada limited-liability company,

Defendant.

PARBALL CORPORATION d/b/a
BALLY'S LAS VEGAS, a Nevada
corporation,

Defendant.

Consolidated Defendants Harrah's Las Vegas, LLC; Flamingo Las Vegas Operating Company, LLC; Desert Palace, Inc.; Paris Las Vegas Operating Company, LLC; and Parball Corporation (collectively "Consolidated Defendants") and Plaintiffs, Trustees Of The Nevada Resort Association - International Alliance Of Theatrical Stage Employees And Moving Picture Machine Operators Of The United States And Canada, Local 720, Pension Trust; Trustees Of The Nevada Resort Association - International Alliance Of Theatrical Stage Employees And Moving Picture Machine Operators Of The United States And Canada, Local 720, Wage Disability Trust; And Trustees Of The Nevada Resort Association - International Alliance Of Theatrical Stage Employees And Moving Picture Machine Operators Of The United States And Canada, Local 720, Apprentice And Journeyman Training And Education Trust ("Plaintiffs") by and through their respective counsel, hereby stipulate as follows:

1. The Parties jointly moved for a stay of proceedings for thirty (30) days on December 31, 2015. (Dkt. No. 81.) The Court granted that Motion on January 15, 2016. (Dkt. No. 82.) After making significant headway on settlement, the Parties requested a three-week extension of the stay

(Dkt. No. 83), which the Court granted on February 3, 2016. (Dkt. No. 84.) That stay expires on February 24, 2016. (*Id.*)

2. The Parties have engaged in multiple rounds of settlement negotiations over the last several weeks. The Parties are in agreement that significant progress has been made during those negotiations, and it is well within the realm of possibilities that this case can be resolved short of trial.

3. The Parties' settlement offers are now within approximately 10% of each other, and a full settlement of all issues appears to be imminent.

4. The Parties agree that it would be advantageous to avoid incurring additional fees and costs while attempting to resolve this case and, thus, are in agreement that a two-week extension of the stay is appropriate.

5. This request is not made for purpose of delay, but rather is intended to permit the Parties' time and resources to be devoted toward finding a possible resolution to this matter.

WHEREFORE, for the reasons stated above, the Parties stipulate to extend the stay imposed for two (2) weeks, or until March 9, 2016.

Dated: February 23, 2016

Dated: February 23, 2016

THE URBAN LAW FIRM

LITTLER MENDELSON

By: /s/ Sean McDonald, Esq.

By: /s/ Rachel Silverstein, Esq.

MICHAEL A. URBAN, ESQ.

RICK D. ROSKELLEY, ESQ.

NATHAN R. RING, ESQ.

RACHEL SILVERSTEIN, ESQ.

SEAN MCDONALD, ESQ.

Attorneys for Defendants

Attorneys for Plaintiffs

IT IS SO ORDERED:

Dated: February 23, 2016



United States District Judge

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